

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

*In Re Flint Water Cases,*

No. 5:16-cv-10444-JEL-MKM  
(consolidated)

Hon. Judith E. Levy

Mag. Mona K. Majzoub

*Walters, et al.,*

*Plaintiffs*

*v.*

*City of Flint, et al.,*

*Defendants*

No. 5:17-cv-10164-JEL-MKM

**PLAINTIFFS' LIAISON COUNSEL'S PROPOSED AGENDA FOR  
APRIL 15, 2020 STATUS CONFERENCE**

In accordance with the Court's Order, ECF No. 1085, Plaintiffs' Liaison Counsel<sup>1</sup> respectfully submit the following agenda items for the April 15, 2020 status conference.

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<sup>1</sup> Pursuant to the Court's Order, ECF. No. 1085, this proposed agenda is filed on behalf of all individual cases.

**I. LAN and VNA's Production of Witnesses for Deposition**

Plaintiffs' Co-Liaison Counsel respectfully request time to discuss LAN and VNA's unwillingness to produce witnesses noticed and confirmed for remote depositions until they are afforded an opportunity to prepare the witness and defend the depositions in person.

**II. EPA's Participation in Upcoming Depositions in *In Re: Flint Water Cases***

Plaintiffs' Co-Liaison Counsel respectfully request time to discuss EPA's refusal to participate in upcoming depositions currently scheduled in *In Re: Flint Water Cases* in contradiction with this Court's Discovery Coordination Protocol Order.

Dated: April 1, 2020

Respectfully submitted,

**NAPOLI SHKOLNIK PLLC**

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*Co-Liaison Counsel for Personal Injury  
Claims*

**CERTIFICATE OF SERVICE**

I hereby certify that on April 1, 2020, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing upon counsel of record.

Dated: April 1, 2020

/s/ Patrick J. Lanciotti